

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KNACK SYSTEMS, LLC)
)
 Plaintiff/Counter-defendant,)
)
 v.) Case No. 3:21-cv-07919
 TECH DENALI, LLC)
)
 Defendant/Counter-plaintiff.)

Via CM/ECF

Honorable Jessica S. Allen, U.S.M.J.
District of New Jersey
Martin Luther King Building and U.S. Courthouse
Courtroom 2B
50 Walnut Street
Newark, New Jersey 07102

April 17, 2023

**Re: Knack Systems, LLC v. TechDenali, LLC
Dkt. No. 21-cv-79219
Joint Letter Regarding Fact Discovery Pursuant to March 2, 2023 Letter Order**

Dear Judge Allen:

Counsel for plaintiff Knack Systems, LLC (“Plaintiff”) and Tech Denali, LLC (“Defendant”) write pursuant to the Court’s March 2, 2023, letter order (ECF No. 54) directing the parties to submit a joint status letter addressing the status of the parties’ completion of fact discovery.

The parties recently completed party depositions of a Rule 30(b)(6) representative from Plaintiff on April 11, and a Rule 30(b)(6) representative from Defendant on April 13. The parties do not contemplate further fact depositions at this time, but have yet to receive or otherwise complete their review of the transcripts of the recent party depositions in order to ascertain whether the testimony elicited therein gives rise to factual discovery issues. To the extent factual discovery issues arose during these depositions, the parties will attempt to meet and confer in order to resolve those issues before bringing them to the Court’s attention.

Accordingly, the parties do not request modifications to the existing discovery deadlines at this time, but will notify the Court promptly should the need to revisit any fact discovery issues arise. We look forward to the parties' upcoming telephonic status conference with the Court, currently scheduled for May 16, 2023. Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I. W. Baker

Matthew I.W. Baker, Esq.
GENOVA BURNS LLC
494 Broad Street
Newark, New Jersey 07102
mbaker@genovaburns.com

RAJAN & RAJAN, LLP
Mahesh Rajan, Jr., Esq.
Eric B. Rochkind, Esq.
1419 Oak Tree Road
Iselin, New Jersey 08830
mahesh@rajanandrajan.com

Counsel for Plaintiff, Knack Systems LLC

By: /s/ Alexandra N. Prejzner

Thomas A. Christensen
Pro hac vice
Alexandra N. Prejzner
Pro hac vice
HUCK BOUMA PC
1755 South Naperville Road, Suite 200
Wheaton, Illinois 60189
630 221-1755
tchristensen@huckbouma.com
aprejzner@huckbouma.com

Iram P. Valentin
New Jersey Attorney I.D. No. 010222002
KAUFMAN DOLOWICH VOLUCK
Court Plaza North 25 Main Street, Suite 500
Hackensack, New Jersey 07601
Telephone: (201) 708-8233
Facsimile: (201) 488-6652
ivalentin@kdvlaw.com

Counsel for Defendant, Tech Denali, LLC